

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, ET AL.,

Plaintiffs,

vs.

CHRISTIAN EXOO, ET AL.

Defendants.

CIVIL ACTION NO.:  
2:20-cv-12880-  
JKS-JSA

Hon. Jessica S. Allen,  
U.S.M.J.

MOTION AND NOTICE OF  
MOTION

Return Date:  
April 15, 2024

**PLEASE TAKE NOTICE** that the Marlborough Law Firm, P.C., and Richard Torres, Esq. counsel for Movant Christian Exoo (“Movant”), shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on April 15, 2024, at 9:00 a.m. or as soon thereafter as counsel may be heard, for the entry of an Order Quashing the subpoena served on Christian Exoo on March 6, 2024, or in the alternative for a protective Order limiting the scope of testimony and documents to be produced.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Movant shall rely upon the Memorandum of Law, and declarations of Christopher Marlborough, Esq. and Christian Exoo submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: March 22, 2024

By:



**THE MARLBOROUGH LAW FIRM, P.C.**  
Christopher Marlborough, Esq.  
375 Sunrise Highway, Suite 3  
Lynbrook, New York 11563  
Phone: (212) 991-8960  
Fax: (212) 991-8952  
E-mail: [chris@marlboroughlawfirm.com](mailto:chris@marlboroughlawfirm.com)

Richard Torres, Esq.  
1 Freeman Lane  
Denville, NJ 07834  
Phone: (347) 742-5362  
E-mail: [richardtorresdna@gmail.com](mailto:richardtorresdna@gmail.com)

*Counsel for Movant Christian Exoo*